

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DESIREE ALLAIRE

Plaintiff,

v.

JODAN KALEMRA, alias, a/k/a
JODAN KALEMBA, RYDER TRUCK
RENTAL, LT., RTRT, INC. in its capacity
As trustee for the Ryder Truck Rental, Lt.
RYDER TRUCK RENTAL, INC.,
IRON MOUNTAIN OFF-SITE DATA,
INC. f/k/a ARCUS DATA SECURITY,
INC., JOHN DOES 1-5

Defendants.

CIVIL ACTION NO. 03-CV-12566 RWZ

DEFENDANTS' JOINT SCHEDULING CONFERENCE MEMORANDUM

Defendants, Jodan Kalemra, alias, a/k/a Jodan Kalemmba, whose true name is Kalemmba Jodan, and Iron Mountain Off-Site Data, Inc. f/k/a Arcus Data Security, Inc., and Defendants Ryder Truck Rental, Lt., RTRT, Inc. in its capacity as trustee for the Ryder Truck Rental, Lt. and Ryder Truck Rental, Inc., hereby submit their Joint Scheduling Conference Memorandum pursuant to Local Rule 16.1(D), as follows:

I. CASE OVERVIEW:

The Plaintiff, Desiree Allaire, has alleged that she was injured on or about December 24, 2000 while she was a passenger in a vehicle driven by Scott Peters in Nashua, New Hampshire. At that time, the vehicle in which the Plaintiff was riding was involved in a collision with a van owned by Defendant, Ryder Truck Rental, Inc. and operated by Defendant, Kalemmba Jodan. At the time of the collision, Jodan was an employee of Defendant, Iron Mountain Off-Site Data, Inc. f/k/a Arcus Data Security, Inc.

II. DISCOVERY PLAN:

Interrogatories and Production of Documents (Requests and Responses), including identification of experts, will be completed by October 1, 2004. Depositions will be completed by April 1, 2005.

III. FILING OF MOTIONS:

Rule 56 Motions will be filed by March 1, 2005.

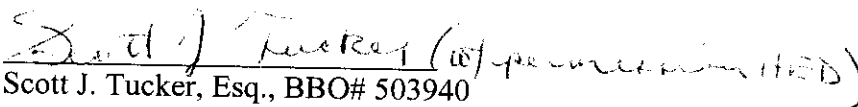
Respectfully submitted,

The Defendants,
Jodan Kalemra, alias, a/k/a Jodan Kalemba,
whose true name is Kalemba Jodan,
and Iron Mountain Off-Site Data, Inc.
f/k/a Arcus Data Security, Inc.
By their attorneys,



Mark B. Lavoie, BBO# 553204
Heather E. Davies, BBO# 651739
McDonough, Hacking & Lavoie, LLP
6 Beacon Street, Suite 815
Boston, MA 02108
(617) 367-0808

The Defendant,
Ryder Truck Rental, Lt., RTRT, Inc.,
In its capacity as trustee for the Ryder Truck
Rental, Lt., and Ryder Truck Rental, Inc.
By their Attorney,



Scott J. Tucker, Esq., BBO# 503940
Tucker, Heifetz & Saltzman, LLP
Three School Street
Boston, MA 02108
(617) 557-9696

CERTIFICATE OF SERVICE

I, Heather E. Davies, Esq., hereby certify that on March 4, 2004, I served a copy of the foregoing Defendants' Joint Scheduling Conference Memorandum by mailing, via regular U.S. mail, to the following: Scott DeMello, Esq., DeMello & Clark, 109 Oak Street, Newton, MA 02464 and Scott J. Tucker, Esq., Tucker, Heifetz & Saltzman, LLP, Three School Street, Boston, MA 02108.

A handwritten signature in cursive script, appearing to read "Heather E. Davies", is written over a horizontal line.

Heather E. Davies, Esq.